



ecology and environment, inc.

111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL. 312-663-9415

International Specialists in the Environment

February 27, 1987

Mr. Cid Morgan
Manager Environmental Systems
Birmingham Steel Corp.
P. O. Box 1208
Birmingham, Alabama 35201

Re: Site Name: Birmingham Bolt, Rt.50 and McKnight Rd., Bourbonnais
TDD No.: F05-8702-168

Dear Mr. Morgan:

This letter is in response to your recent inquiry requesting additional information concerning our firm. Ecology and Environment, Inc. has been retained by the U.S. Environmental Protection Agency under contract 68-01-7347 for the purpose of evaluating candidate sites for the National Priorities List originally under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), better known as Superfund and presently the Superfund Amendments and Reauthorization Act (SARA).

As part of our evaluation, the U.S. EPA has asked us to perform an on-site inspection of the property in question. This is the reason for my request to visit the facility on a future date.

I have attached a copy of the Letter of Introduction provided by the U.S. EPA for Ecology and Environment employees engaged in field investigation work, which outlines the statutory basis for such inspections. Also, attached is a copy of the confidentiality memorandum that all Ecology and Environment employees have signed. So you have a better understanding of the questions we need to ask, I have also attached a copy of the site inspection form.

If you require additional information or if a change in plans is necessary, please do not hesitate to call me. I will be contacting you shortly to discuss arrangements for the site inspection.

Sincerely,

Cynthia Pugh

63X:6F

EPA Region 5 Records Ctr.



296176



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF

LETTER OF INTRODUCTION

This is to certify that Cynthia Pugh, of Ecology and Environment, Inc., whose signature, photograph, and physical description appear below is a contract employee of the Environmental Protection Agency duly designated by the Administrator. It is requested that, upon presentation of this letter, she be allowed:

- a. to enter any facility maintained by any person where hazardous wastes are generated, stored, treated, disposed of or transported from;
- b. to inspect and obtain samples from your facility of any hazardous wastes and samples of any containers or labeling for such wastes;
- c. to have access to and to copy all records relating to such wastes;
- d. to determine compliance with any effluent limitation or other limitation, prohibition or effluent limitation or other limitation, prohibition or effluent standard, pretreatment standard, standard of performance, levels of performance, sanitary landfill criteria, standards applicable to waste generators, transporters, and owners and operators of hazardous waste treatment, storage and disposal facilities, or other standards any permit, compliance order, or court order issued pursuant to the Resource Conservation Recovery Act (RCRA) 42 U.S.C. 6901 et. seq.;
- e. to talk to employees concerning waste management practices;
- f. to determine compliance with Section 311 of the Clean Water Act (CWA) 33 U.S.C. 466 et. seq.

- g. to conduct investigations and monitoring pursuant to Section 104 (b) and (e) of CERCLA (the Comprehensive Environmental Response, Compensation, and Liability Act) 42. U.S.C. 9604 et. seq.

The statutory basis for these inspections is contained in Section 3007 of the RCRA, Section 308 of the CWA, and Section 104 of CERCLA.

In addition, it is requested that, under authority of Section 308 of the CWA and Section 104 of CERCLA, Cynthia Pugh be allowed access to the scene of emergency incidents to:

- a. monitor cleanup/mitigation operations and assess potential impacts of the incident on public health and the environment;
- b. collect and analyze samples, and assess damages to natural resources and the environment.

Information requested pursuant to the above statutory authority must be provided notwithstanding its characterization as confidential or containing trade secrets. Provisions for protecting such confidential information are contained at 40 CFR Part 2. Accordingly, please indicate any information which you consider to be privileged or confidential so that EPA may take appropriate protective measures.

Height 5'5"

Weight 130

Color of Eyes Brown

Color of Hair Brown

Date of Birth Exemption 6 - Not Responsive

Signature Cynthia Pugh

Expiration Date 9/30/91

Valdas V. Adamkus
Regional Administrator





ecology and environment, inc.

ROSSLYN CENTER, 1700 NORTH MOORE ST., ARLINGTON, VA 22209, TEL. 703 522-6065

International Specialists in the Environmental Sciences

July 1, 1983

Dear Employee working under EPA contracts or subcontracts:

In the course of our work for the EPA or its contractors, company employees will have access to and compile information and records of private companies. These private companies have a legitimate interest in protecting the information and their records from dissemination or disclosure to their competitors or other persons not having a need to know. This confidential business information may include trade secrets, patented processes or other types of business data.

EPA has anticipated this problem and has obtained the passage of legislation protecting such confidential business information with severe criminal penalties for unlawful disclosure (including fines up to \$5000 and/or imprisonment up to one year), and provided in its contracts or subcontracts with E&E for additional safeguards. As part of this provision, E&E must obtain from each of its employees a written agreement to honor the limitations on dissemination, release or use of confidential business information.

In compliance with our contractual obligations, and for your own personal protection, E&E requires that each of its employees on EPA contracts and subcontracts read this letter and the attachment, and sign the statement at the foot of this letter. A copy of this letter should be retained by you and shown to private companies who express concern over protection of their trade secrets or other proprietary information. The original will be retained in E&E's corporate files.

Very truly yours,

Roger G. Gray
Vice President
Zone Program Manager

I HAVE READ THIS LETTER AND THE ATTACHMENT ON TREATMENT OF
CONFIDENTIAL INFORMATION AND I AGREE TO COMPLY WITH AND BE BOUND BY
IT IN ALL RESPECTS.

Employee Signature

The Contracting Officer has determined that during the performance of this contract EPA may furnish confidential business information to the Contractor that EPA obtained under the Clean Air Act (42 U.S.C. 1457 *et seq.*), the Federal Water Pollution Control Act (33 U.S.C. 1251 *et seq.*), the Safe Drinking Water Act (42 U.S.C. 300f *et seq.*), the Federal Insecticide, Fungicide and Rodenticide Act (7 U.S.C. 136 *et seq.*), the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 *et seq.*), the Resource Conservation and Recovery Act (42 U.S.C. 6901 *et seq.*), or the Toxic Substances Control Act (15 U.S.C. 2601 *et seq.*). EPA regulations on confidentiality of business information in 40 CFR Part 2 Subpart B require that the Contractor agree to the Clause entitled "Treatment of Confidential Business Information" before any confidential business information may be furnished to the Contractor.

TREATMENT OF CONFIDENTIAL BUSINESS INFORMATION

(a) The Contracting Officer, after a written determination by the appropriate program office, may disclose confidential business information to the Contractor necessary to carry out the work required under this contract. The Contractor agrees to use the confidential information only under the following conditions:

(1) The Contractor and Contractor's Employees shall: (i) use the confidential information only for the purposes of carrying out the work required by the contract; (ii) not disclose the information to anyone other than EPA employees without the prior written approval of the Deputy Associate General Counsel for Contracts and General Administration; and (iii) return to the Contracting Officer all copies of the information, and any abstracts or excerpts therefrom, upon request by the Contracting Officer, whenever the information is no longer required by the Contractor for the performance of the work required by the contract, or upon completion of the contract.

(2) The Contractor shall obtain a written agreement to honor the above limitations from each of the Contractor's Employees who will have access to the information, before the employee is allowed access.

(3) The Contractor agrees that these contract conditions concerning the use and disclosure of confidential information are included for the benefit of, and shall be enforceable by, both EPA and any affected business having a proprietary interest in the information.

(4) The Contractor shall not use any confidential information supplied by EPA or obtained during performance hereunder to compete with any business to which the confidential information relates.

(b) The Contractor agrees to obtain the written consent of the Contracting Officer, after a written determination by the appropriate program office, prior to entering into any subcontract that will involve the disclosure of confidential business information by the Contractor to the subcontractor. The Contractor agrees to include this clause, including this paragraph (b), in all subcontracts awarded pursuant to this contract that require the furnishing of confidential business information to the subcontractor.